

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

INNOVATIVE SOLUTIONS
INTERNATIONAL, INC., a Washington
corporation,

Plaintiff,

v.

HOULIHAN TRADING CO., INC., a
Florida corporation; BRIGHTON GROUP,
LLC, an Arkansas limited liability company;
MARCUS TECHNOLOGIES LLC, a Texas
limited liability company; SHUMAKER
INTERNATIONAL CORP., a Tennessee
corporation; COOK INTERNATIONAL
TRADE & BROKERAGE, INC., a Florida
corporation; NORTH SOUTH FOODS
GRP., INC., a Florida corporation;
HENLEY'S WHOLESALE MEATS, INC.,
an Arkansas corporation; PILGRIM'S
PRIDE CORP., a Delaware corporation; and
DOES 1–10,

Defendants.

Case No. 2:22-cv-00296-JCC

PARTIES' DESIGNATED
DEPOSITION TRANSCRIPTS

1 Innovative Solutions International, Inc., Houlihan Trading Co. Inc., and Pilgrim's Pride
2 Corp. respectfully submit designated deposition transcripts as part of their Pretrial Order, pursuant
3 to the Court's Order of March 22, 2024. Dkt. No. 261. The designated transcripts include all
4 parties' designations, counter designations, objections, and responses to objections. The
5 transcripts are as follows:

6 1. **Exhibit 1** is the designated deposition transcript of Pilgrim's Pride Corp. Fed. R.
7 Civ. P. 30(b)(6) representative Alice Craft McLaughlin, dated May 10, 2023.

8 2. **Exhibit 2** is the designated deposition transcript of Pilgrim's Pride Corp. employee
9 Alice Craft McLaughlin, dated April 26, 2023.

10 3. **Exhibit 3** is the designated deposition transcript of Cook International Trade &
11 Brokerage, Inc. Fed. R. Civ. P. 30(b)(6) representative Dan Cook, dated January 12, 2023.

12 4. **Exhibit 4** is the designated deposition transcript of Brighton Group, LLC Fed. R.
13 Civ. P. 30(b)(6) representative Bryan Griggs, dated February 13, 2022.

14 5. **Exhibit 5** is the designated deposition transcript of Pilgrim's Pride Corp. Fed. R.
15 Civ. P. 30(b)(6) representative Mike Henry, dated May 10, 2023.

16 6. **Exhibit 6** is the designated deposition transcript of Henley's Wholesale Meats, Inc.
17 Fed. R. Civ. P. 30(b)(6) representative Cara Huntsman, dated October 20, 2022.

18 7. **Exhibit 7** is the designated deposition transcript of Pilgrim's Pride Corp. employee
19 Larry Tanner Lipsey, dated April 21, 2023.

20 8. **Exhibit 8** is the designated deposition transcript of Marcus Technologies, LLC Fed.
21 R. Civ. P. 30(b)(6) representative Billy Marcus, dated January 19, 2023.

22 9. **Exhibit 9** is the designated deposition transcript of former Pilgrim's Pride Corp.
23 employee Dolan Patterson, dated May 15, 2023.

24 10. **Exhibit 10** is the designated deposition transcript of Shumaker International Corp.
25 Fed. R. Civ. P. 30(b)(6) representative Jacob Shumaker, dated November 17, 2022.

11. **Exhibit 11** is the designated deposition transcript of Pilgrim's Pride Corp. employee Santiago Tinoco, dated April 28, 2023.

12. **Exhibit 12** is the designated deposition transcript of Pilgrim's Pride Corp. employee Alana Wright, dated April 24, 2023

13. Being filed separately under seal pursuant to Court procedures is the designated deposition transcript of Trader Joe's Fed. R. Civ. P. 30(b)(6) representative Jason Larson, dated February 14, 2022. A slip sheet standing in for that filing is attached as **Exhibit 13**.

In the designations, boxes on the right-hand side of the page indicate where a party has made an affirmative designation, a counter-designation, or has objected to a designation. Designations, counter-designations, and objections are indicated by a range showing Page:Line:Word. In cases where a party has objected to a designation, the basis for that party's objection is listed directly under the range showing the content objected to, and the responding party's response to the objection is directly below the objection. For example:

22.1	DES--4 22:1:1-23:17:2 ● Innovative Affirmative
22.2	DES--565 22:1:1-23:17:2 ● Houlihan Crossclaim
22.3	DES--1486 22:1:1-23:17:2 ● Pilgrim Objection to Innovative Affirmative ER 401-403 - Relevance Any prejudice does not substantially outweigh probative value. Testimony goes to nature/requirements of 584 chicken; see Innovative response to Pilgrim's MIL No. 1.

1 The first box above shows an Innovative affirmative designation. The second box above
2 shows a Houlihan crossclaim designation. The third box above shows a Pilgrim's objection to an
3 Innovative designation. Each box shows the range of the testimony designated or objected to.
4 Pilgrim's objection is the two lines next to and directly below the red dot. Innovative's response
5 to the objection is the language slightly below, beginning, "Any prejudice"

6 The unique "DES-NNN" identifiers in the boxes on the right-hand side of the transcripts
7 are there to assist the parties, and the Court, if needed, in identifying particular designations,
8 counter-designations, and objections. They do not otherwise have any significance.

1 Dated: March 29, 2024.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I, Elizabeth H. White, certify under penalty of perjury under the laws of the State of Washington that on March 29, 2024, I caused to be served a true and correct copy of the foregoing document on:

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DATED: March 29, 2024

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